

**From:** [Benbow, Gene](#)  
**To:** [david.kratville@cdfa.ca.gov](mailto:david.kratville@cdfa.ca.gov)  
**Cc:** [Hebert, John](#)  
**Subject:** RE: Bait stations in crops  
**Date:** Monday, May 06, 2013 7:35:00 AM  
**Attachments:** [Untitled \(5\).pdf](#)

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Hi David,

Here is the pdf version for you – let me know if you have any trouble with it.

Thanks!

Gene Benbow  
Biologist  
Insecticides-Rodenticides Branch  
<http://epa.gov/pesticides/>

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**From:** Kratville, David@CDFA [david.kratville@cdfa.ca.gov]  
**Sent:** Friday, May 03, 2013 12:49 PM  
**To:** Hebert, John  
**Subject:** RE: Bait stations in crops

John,

When you get a chance could you resend the attached letter as something other than a .tif? I only received the first page of this scan. Unless that is all you intended to send me.

Thanks,

David Kratville  
Staff Environmental Scientist  
California Dept. of Food & Agriculture

office: (916)654-0768  
cell: (916)799-5462

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**From:** Hebert, John [Hebert.John@epa.gov]  
**Sent:** Wednesday, April 17, 2013 11:34 AM  
**To:** Kratville, David@CDFA  
**Subject:** RE: Bait stations in crops

David – This is what I wrote before I actually spoke with someone that has some serious history here:

*I just fielded a call from John Inouye on this exact topic. As far as I know there is no such policy. I think we look at these “crop” uses case by case and make a call on whether they are food/nonfood. Things that play into this would be time of application (ie, dormant, bearing, etc), how the product is applied, etc. Use of bait station may make a rodenticide “non-food” but I don’t know if we can say that for all situations. Make sense? Helpful?*

So, I’ve attached a memo from 1987 that does have some guidance on how we might make these

determinations. I don't think what I said is necessarily wrong though....I think it's still case by case. Can you please share this with John Inouye too? Thanks.....

John

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**From:** Kratville, David@CDFA [<mailto:david.kratville@cdfa.ca.gov>]

**Sent:** Wednesday, April 17, 2013 12:13 PM

**To:** Hebert, John

**Subject:** Bait stations in crops

John,

I was recently asked if there was a guidance letter that discusses bait stations application of rodenticides within crops. The gentleman I spoke to claimed he had read that it was reasonable to assume that crop contamination would not occur if using bait stations. Would he be referring to a document that EPA produced or perhaps DPR?

Thank you,

David Kratville  
Environmental Scientist  
California Dept. of Food & Agriculture

office: (916)654-0768

cell: (916)799-5462